

1 Paul J. Cambria, Jr. (CA 177957)
2 pcambria@lglaw.com
3 LIPSITZ GREEN SCIME CAMBRIA LLP
4 42 Delaware Avenue, Suite 120
5 Buffalo, New York 14202
6 Telephone: (716) 849-1333
7 Facsimile: (716) 855-1580

8 Attorneys for Michael Lacey

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In the Matter of the Seizure of:

Any and all funds held in Republic
Bank of Arizona Account(s) xxxx1889,
xxxx2592, xxxx1938, xxxx2912, and,
xxxx2500.

Case No. 2:18-cv-06742-RGK-PJW

**CLAIMANT MICHAEL LACEY'S
JOINDER IN JAMES LARKIN'S LEGAL
AUTHORITY FOR OPPOSITION TO
SEIZURE WARRANTS AND BASIS FOR
RELIEF**

Assigned to Hon. R. Gary. Klausner
Courtroom 850

1 TO THE COURT AND ALL COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE THAT Claimant Michael Lacey, by and through
3 his counsel, will and hereby does join in James Larkin's Legal Authority for
4 Opposition to Seizure Warrants and Basis for Relief [Doc. 106], and adopts all of
5 the positions set forth in the Opposition as if fully set forth herein.

6 Mr. Lacey joins in the Opposition because he is "so similarly situation [to Mr.
7 Larkin] that filing an independent [opposition] would be redundant." *Tatung Co.,*
8 *Ltd. v. Shu Tze Hsu*, 217 F. Supp. 3d 1138, 1151 (C.D. Cal. 2016). Like Mr. Larkin,
9 Mr. Lacey holds an interest in assets that were seized pursuant to civil seizure
10 warrants issued by the magistrate judges in this District, and which are the subject
11 of Mr. Larkin's Motion to Vacate or Modify Seizure Warrants (the "Seizure
12 Motion") [Doc. 6]. The Opposition raises issues that are directly relevant to and
13 overlap with the seizures of Mr. Lacey's assets. All of the arguments made in the
14 Opposition therefore apply with equal force to the seizure warrants issued against
15 the assets in which Mr. Lacey holds an interest.

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19 DATED: November 14, 2019 Respectfully submitted,

20 Paul J. Cambria, Jr.
21 Lipsitz Green Scime Cambria LLP
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23 By: /s/ Paul J. Cambria, Jr.
24 Paul J. Cambria, Jr.
25 Attorneys for Michael Lacey
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2
3 **CERTIFICATE OF SERVICE**

4 I hereby certify that on November 14, 2019, I filed the foregoing with the United
5 States District Court for the Central District of California using the CM/ECF system.

6 I hereby certify that on November 14, 2019, a copy of the foregoing was also
7 delivered to the following via CM/ECF:

8 JOHN K. KUCERA, ESQ.
9 Assistant U.S. Attorney
10 U.S. Attorney's Office
11 Asset Forfeiture Section
12 312 North Spring Street
13 Los Angeles, CA 90012

14 Dated: Buffalo, New York
15 November 14, 2019

16
17 /s/Kristina Drewery
18 Kristina Drewery
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